

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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LETICIA STIDHUM and DAVID MANRIQUE, on
their own behalf and on behalf of others similarly
situated,

Plaintiffs,
-against-

Case No.: 1:19-cv-1625 (ARR) (RML)

NOTICE OF MOTION

161-10 HILLSIDE AUTO AVE., LLC d/b/a Hillside
Auto Outlet, HILLSIDE AUTOMALL INC d/b/a
Hillside Auto Mall, ISHAQUE THANWALLE, and
RONALD M. BARON,

Defendants.

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PLEASE TAKE NOTICE, that pursuant to Rule 72(a) of the Federal Rules of Civil
Procedures (hereinafter “Rules” or “Rule”), the Memorandum of Law in Support, the Declaration
of Emanuel Kataev, Esq. with its accompanying exhibits, and all the papers and pleadings in this
case, Defendants will respectfully move this Court before the Hon. Allyne R. Ross, U.S.D.J., on a
date and time to be determined by the Court, for an Order setting aside the Hon. Robert M. Levy,
U.S.M.J.’s Report and Recommendation, dated March 3, 2022, denying Defendants’ motion for
attorneys’ fees pursuant to Rule 41(d), as well as for such other and further relief as this honorable
Court deems just, equitable, and proper.

Dated: Lake Success, New York
March 28, 2022

MILMAN LABUDA LAW GROUP PLLC

By: /s Emanuel Kataev, Esq. _____

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